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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

vs.

EUGENI STOYTCHIEV, et al.

Defendant.

CASE NO.: 2:11-CR-00434-LDG-GWF

JOINDER IN MOTION TO CONTINUE
(Dkt. No. 319) (FIRST REQUEST)

COMES NOW, Defendant EUGENI STOYTCHIEV (hereinafter “STOYTCHIEV”) by and through counsel of record William H. Gamage, Esq. of Gamage & Gamage and hereby joins in Co-Defendant MICHAEL VALES’ Motion to Continue Trial (Dkt. No. 319) in the above titled matter. This Motion is made and based upon all papers and pleadings on file herein, the attached Memorandum of Points and Authorities, along with any oral argument deemed necessary by this Honorable Court.

DATED THIS 17th day of December, 2012.

GAMAGE & GAMAGE

/s/ William H Gamage, Esq.

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Nevada

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MEMORANDUM OF POINTS AND AUTHORITIES

Defendant STOYTCHEV hereby requests that his trial be continued; adopts the points and authorities submitted by Co-Defendant MICHAEL VALES in his Motion to Continue Trial; and offers the following additional information:

1. Counsel for STOYTCHEV was appointed to represent this Defendant on or about November 27, 2012 as prior CJA appointed counsel was deployed as an army reservist to Afghanistan. Consequently, prior counsel is not available to assist current counsel in getting up to speed on the nature of his prior investigation of the facts and circumstances surrounding the government's allegations against STOYTCHEV.

2. Between November 27, 2012 and today, counsel has had an opportunity to interview his client and to complete a cursory review of several discs containing discovery information. Additionally, counsel has reviewed discovery information made available in an online format. Thousands of documents have been produced by the Government in support of their case.

3. It does not appear that prior counsel retained any computer forensic expert or an investigator in support of the defense. Counsel likely will need these services regarding this matter.

4. This matter has been deemed 'complex' for purposes of discovery. Consequently, counsel for STOYTCHEV needs substantial additional time to appropriately prepare a defense in this matter in order to provide effective representation.

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